



California Regional Water Quality Control Board

San Francisco Bay Regional Water Quality Control Board

Winston H. Hickox
Secretary for
Environmental
Protection

Internet Address: <http://www.swrcb.ca.gov>
1515 Clay Street, Suite 1400, Oakland, California 94612
Phone (510) 622-2300 FAX (510) 622-2460



Gray Davis
Governor

TO: Craig J. Wilson, Chief
TMDL Listing Unit

FROM: Steve Moore, 303(d) List Coordinator
**SAN FRANCISCO BAY REGIONAL
WATER QUALITY CONTROL BOARD**

DATE: August 13, 2002

SUBJECT: Proposed Beach Closure-related Listings, Region 2

This memorandum clarifies the recommendations from the San Francisco Bay Regional Water Quality Control Board for the 2002 303(d) list, pertaining to beach closure-related listings.

In response to letters you received on your draft report dated April 2, 2002, in particular the San Francisco Public Utilities Commission (SFPUC) letter dated May 16, 2002, we have been examining the technical basis of our proposed beach closure-related listings. As indicated in a previous email message to you, we discovered erroneous available information on which we relied to make recommended changes to the 1998 303(d) list of impaired water bodies. Specifically, "Testing the Waters, 2000," authored by the Natural Resources Defense Council (NRDC), intermingled posted beach warnings with beach closures, leading us to make recommendations for listing for beach closures that were based only on beach advisories or warnings. The EPA guidance used in the 303(d) analysis is only pertinent to evaluation of beach closure information, where more than one beach closure per year, or one beach closure over a week's duration, both constitute adequate basis for inclusion in the 303(d) list. Therefore, we have had to re-examine the original rationale for beach closure-related listings, to verify whether or not the recommendations were made on posted warnings or actual closures.

We have been using the data from the State Board's Clean Beaches Initiative to verify whether or not our recommendations were based on beach closures or beach advisories. Any recommendations based on closures are upheld, and any recommendations based on advisories we now recommend to be removed from the 303(d) list. As stated below, only one case may continue to warrant inclusion on the 303(d) list.

We recommend removing three San Francisco beaches from the 303(d) list recommendations for beach closures. They are:

Pacific Ocean at Ocean Beach;
Pacific Ocean at Fort Funston; and
Pacific Ocean at China Beach.

These recommendations are based on the fact that no beach closures have occurred on these beaches from 1998-2002, based on State Board information. Baker Beach is recommended to remain on the list, based on bacteriological data, but combined sewer overflows (CSOs) need to be removed as an identified source, since all CSOs in the City have been directed away from the Lobos Creek drainage, according to SFPUC officials, and we concur with this statement.

A review of State Board information on San Mateo County beaches shows that the listings were recommended in error. All of the information in the NRDC report was based on State Board's year 2000 beach advisory postings, and not actual closures. As such, we recommend removing five San Mateo County beaches from the 303(d) list recommendations for beach closures. They are:

Pacific Ocean at Pacifica State Beach;
Pacific Ocean at Pillar Point Beach;
Pacific Ocean at Fitzgerald Marine Reserve;
Pacific Ocean at Sharp Park Beach; and
Pacific Ocean at Surfer's Beach.

We note an alternative of retaining Pacifica State Beach (at Linda Mar) as listed for beach closures due to information from 1998 (1/12/98-1/19/98; 1/18/98-1/25/98; 2/7/98-2/14/98; 2/9/98-2/16/98) that indicated sustained closures from sewage spills that trigger EPA's guidance for listing. However, since spring 1998 (over 4 years ago), no closures at this beach have been reported to the State Board, and therefore an impairment finding related to beach closures may be an overstatement of water quality impairment. Regardless we are already recommending listing of this beach for high coliform count, which will trigger an identical management response.

With the exception of Sharp Park Beach, the other San Mateo County beaches listed above are already recommended for listing for high coliform count based on extensive data collected by the County Department of Environmental Health. All of this supporting information is on the State Board website under the headings of San Mateo and San Francisco counties at: <http://www.swrcb.ca.gov/beach/advisories.html>. We have retained hard copies of these reports in our administrative record. Marin County has not submitted information to the State Board, so information is not readily available to evaluate attainment of water quality standards at beaches in that county. Alameda and Contra Costa counties have had no beach closures from 1998-2002.

Thank you for your attention in this matter, and for limiting beach closure-related listings to the more severe cases where the public is prohibited from using a beach based on public health concerns. Beach advisories are common preventive actions where the link to water quality problems is not demonstrated, and in staff's opinion they are not a valid indicator of water quality attainment. We request that this nuance in reporting be considered in development of the state's 303(d) listing policy.